

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	
VS.	§	CR. NO. 4:10-CR-00787
	§	
ALIREZA ETESSAMI	§	

DEFENDANT’S UNOPPOSED MOTION FOR PERMISSION TO TRAVEL

TO THE HONORABLE SIM LAKE, UNITED STATES DISTRICT JUDGE FOR
THE SOUTHERN DISTRICT OF TEXAS, HOUSTON DIVISION:

Defendant, ALIREZA ETESSAMI, moves this Court to enter an order permitting him to travel to New York and Florida herein, and in support of this motion would as follows.

Defendant would like to travel to New York, New York for a short trip with his wife. Defendant will depart Houston on October 28, 2012 and will return to Houston on November 4, 2012. Defendant will provide detailed information to U.S. Pretrial Services. Defendant can be reached at all times on his cellular phone, which is on file with U.S. Pretrial Services.

In addition to this travel, defendant would like to travel to Weston, Florida to visit his family who resides in the Miami area during the holidays. Defendant will depart Houston on December 13, 2012 and will return to Houston on January 2, 2013. Defendant will provide detailed information to U.S. Pretrial Services.

Defendant can be reached at all times on his cellular phone, which is on file with U.S. Pretrial Services.

Defendant will abide by all conditions of release and check-in with U.S. Pretrial Services before departing and upon returning to Houston.

U.S. Pretrial Services Officer Scott Cooper and Assistant United States Attorney Jason Varnado are unopposed to this motion.

WHEREFORE, PREMISES CONSIDERED, the defendant respectfully prays that this Honorable Court grant this motion and allow him to travel to New York and Florida.

Respectfully submitted,

/s/ Kent A. Schaffer

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Attorney for Defendant,
ALIREZA ETESSAMI

CERTIFICATE OF CONFERENCE

On October 5, 2012, counsel for defendant conferred with the U.S. Pretrial Services Officer, Scott Cooper, concerning his position on Defendant's Motion for Permission to Travel. Mr. Cooper stated that he is unopposed to this motion.

On October 8, 2012, counsel for defendant also conferred with AUSA Jason Varnado concerning his position on Defendant's Motion for Permission to Travel. Mr. Donnelly stated that he is unopposed.

/s/ Kent A. Schaffer

KENT A. SCHAFFER

CERTIFICATE OF SERVICE

I hereby certify that on October 11, 2012, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to AUSA Jason Varnado via the court's electronic system. In addition, a courtesy copy will be served via facsimile (713-250-5666) to U.S. Pretrial Services Officer Scott Cooper.

/s/ Kent A. Schaffer

KENT A. SCHAFFER